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CURRENT DECISIONS

ADMIRALTY—SEAMEN'S WAGES—ADVANCES IN FOREIGN PORT BY FOREIGN VESSEL.—The libelants were seamen who signed in France for two years' service on a British ship, receiving an advance of a half-month's wages, which was legal under British law. When the vessel reached New York, the seamen, being afraid of submarines, abandoned their contract and, a demand for half their wages having been refused, libeled the vessel, claiming full wages and contending that the advance payment made in France was void under the Seamen's Act (U. S. Comp. St. 1916, secs. 8322-3). *Held*, that the libelants were not entitled to recover, as they had already received more than half of their wages in advance and such advances were legal payments. *The Belgier* (1917, S. D. N. Y.) 246 Fed. 966.

The federal statute has been held to forbid advances by foreign ships in American ports and by American ships in foreign ports. *Patterson v. Bark Eudora* (1903) 190 U. S. 169, 23 Sup. Ct. 821; *The Rhine* (1917, E. D. N. Y.) 244 Fed. 833. One case has held that it forbids advances to alien seamen by a foreign ship in a foreign port. *The Imberhorne* (1917, S. D. Ala.) 240 Fed. 830. It is believed that the principal case makes a more reasonable construction of the statute in excluding such a case from its application.

CONFLICT OF LAWS—JURISDICTION FOR DIVORCE—SUIT BETWEEN ALIENS IN FRANCE.—An action for divorce was brought by a Russian woman against her Russian husband in the French courts. In accordance with the requirements of Russian law (one of the parties having been a Roman Catholic and the other a member of the Orthodox Russian Church), they had been married in Paris by a Russian clergyman; and they had also had a marriage ceremony performed by a French civil officer. By the Russian law, a divorce between people whose marriage was required to be celebrated before a Russian clergyman must likewise be pronounced by a Russian clergyman. *Held*, on a plea to the jurisdiction of the French court, that the court had no jurisdiction, inasmuch as the parties were governed by their national (Russian) law, which was their personal statute. The court added that a treaty of 1874 between Russia and France giving the citizens of either contracting party full access to the courts of the other had no application to the case, and that the French civil courts could neither enforce the provisions of the Russian law requiring Russian religious authorities to pronounce a divorce, nor enforce the French law in substitution for the Russian law. *Stankiewicz v. Stankiewicz*, Court of Paris, Jan. 26, 1914, reported in (1917) 44 CLUNET, 602.

This decision may be contrasted with another, also involving the marriage status of aliens. The marriage of two British subjects, celebrated in France, was annulled by a British court. On application in France for an *exequatur* validating and decreeing the registration of the British judgment, it was held that the judgment should be enforced in France. *Sassoon v. Sassoon*, Tribunal Civil de la Seine, December 13, 1916, reported in (1917) 44 CLUNET, 614.

CONTEMPT—DIRECT CONTEMPTS—LETTER MAILED TO JUDGE.—While an appeal from a decree denying probate of a will was pending before the Prerogative Court of New Jersey, the proponent of the will mailed a letter to the Ordinary in which he abused opposing counsel and the trial judge, disparaged a witness and protested that he would agree to donate whatever he might receive under the will, if it were probated, to any charitable institution the Ordinary might